

SECTION III—REMARKS

This Amendment is submitted in response to the Office Action mailed December 23, 2003, which action the Examiner made final. Claim 18 is amended herein for the sake of clarity. Claims 13-21 remain pending in the application. Applicants respectfully request allowance of all pending claims in view of the above amendments and the following remarks.

Claim Objections

The Examiner objected to claim 18 because it appears to be an exact copy of claim 16, and required that one of the claims be cancelled. In this amendment, Applicant has amended claim 18 so that it is no longer a substantial duplicate of claim 16. Applicant respectfully submits that this overcomes the Examiner's objection.

Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 13-21 under 35 U.S.C. § 103(a) as obvious in view of, and therefore unpatentable over, combinations of U.S. Patent No. 5,394,054 to Chen ("Chen '054"), U.S. Patent No. 5,327,044 to Chen ("Chen '044"), and prior art allegedly admitted by Applicant. Applicant respectfully traverses the Examiner's rejections. To establish a *prima facie* case of obviousness, three criteria must be met: (1) the prior art references must teach or suggest all the claim limitations; (2) some suggestion or motivation to combine the references must be found in the prior art; and (3) there must be a reasonable expectation of success. MPEP § 2143. As explained below, the Examiner has not established a *prima facie* case of obviousness.

Claim 13 recites a CRT combination comprising "a second lens between the focus electrode and a continuous internal conductive coating on the neck and the funnel, wherein the internal conductive coating is connected to anode potential through an anode button in the neck." The Examiner concedes that Chen '054 does not disclose a second lens formed between the focus electrode and the continuous internal coating. The Examiner, however, alleges that Chen '044 discloses a main focus lens formed between a focus electrode G3 and electrode G4 formed of a conductive coating deposited on the inner surface of the glass envelope coupled to the anode button. The Examiner concludes that it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the second lens of Chen '054 as taught by Chen '044.

Applicant disagrees. Chen '054 and Chen '044 cannot be combined as suggested by the Examiner because Chen '054 teaches directly away from such a combination. Chen '054 teaches that all the grids should have the same inner diameter, so that they can receive a cylindrical mandrel during assembly of the electron gun (col. 3, lines 38-41; col. 5, lines 11-15). The cylindrical mandrel helps to maintain fixed alignment between the electrodes during assembly (col. 5, lines 22-24) so that the grids in the resulting electron gun will be precisely aligned (col. 3, lines 52-55). Thus, Chen '054 teaches away from a combination with a grid G4 formed of a conductive coating deposited on the inner surface of the glass envelope, because using such an electrode would be contrary to the teaching of Chen '054 that all grids have equal diameters. Moreover, Chen '054 teaches that the grids should not overlap, but instead should be separated by a distance L , where the distance L bears a relationship to the thickness T of the grid such that $3.0 \geq T/L \geq 0.75$ (col. 5, lines 39-45); according to Chen '054, this separation L reduces the influence of external stray electrostatic fields, which inhibits focusing and degrades electron beam spot size (col. 5, lines 46-61). A combination of Chen '054 with the grid G4 of Chen '044 would not meet these requirements, and therefore Chen '054 cannot teach such a combination. For these reasons, Chen '054 teaches directly away from combination with Chen '044, and Applicant submits that Chen '054 and Chen '044 therefore cannot obviate claim 13. Applicant therefore respectfully requests withdrawal of the rejection and allowance of the claim.

Regarding claims 14 and 15, if an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 13 is in condition for allowance. Applicant therefore respectfully submits that claims 14 and 15 are allowable by virtue of their dependence on allowable claim 13, as well as by virtue of the features recited therein. Applicant thus respectfully requests withdrawal of the rejections and allowance of these claims.

Claim 16 recites a CRT combination comprising "a second lens between the focus electrode and a continuous internal conductive coating on the neck and the funnel, wherein the internal conductive coating is connected to anode potential through an anode button in the neck." As discussed above in connection with claim 13, the references relied upon in this Office Action cannot teach a combination including the claimed limitation. Applicant submits that claim 16 is

therefore in condition for allowance, and respectfully requests withdrawal of the rejection and allowance of the claim.

Regarding claim 17, if an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 16 is in condition for allowance. Applicant therefore respectfully submits that claim 17 is allowable by virtue of its dependence on allowable claim 16, as well as by virtue of the features recited therein. Applicant therefore respectfully requests withdrawal of the rejections and allowance of this claim.

Claim 18, as amended, recites a CRT combination comprising “a second lens between the focus electrode and a continuous internal conductive coating on the neck and the funnel, wherein the internal conductive coating is connected to anode potential less than or equal to twelve kilovolts through an anode button in the neck.” As discussed above in connection with claim 13, the references relied upon in this Office Action cannot teach a combination including the claimed limitation. Applicant submits that claim 18 is therefore in condition for allowance, and respectfully requests withdrawal of the rejection and allowance of the claim.

Claim 19 recites an einzel focusing lens comprising, among other things, “a second lens between the focus electrode and a continuous internal conductive coating on the neck and the funnel, wherein the internal conductive coating is connected to anode potential through an anode button in the neck.” As discussed above in connection with claim 13, the references relied upon in this Office Action cannot teach a combination including the claimed limitation. Applicant submits that claim 19 is therefore in condition for allowance, and respectfully requests withdrawal of the rejection and allowance of the claim.

Regarding claims 20 and 21, if an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 19 is in condition for allowance. Applicant therefore respectfully submits that claims 20 and 21 are allowable by virtue of their dependence on allowable claim 19, as well as by virtue of the features recited therein. Applicant thus respectfully requests withdrawal of the rejections and allowance of these claims.

Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.


Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 3-23-04



Todd M. Becker
Attorney for Applicant(s)
Registration No. 43,487

Blakely, Sokoloff, Taylor & Zafman LLP
12400 Wilshire Boulevard, Seventh Floor
Los Angeles CA 90025-1030
Phone: 206-292-8600
Facsimile: 206-292-8606

Enclosures: Postcard
 Transmittal Letter, in duplicate